

Meeting: SLT

Date: 30/10/17

Agenda Item: 11

Time: 10 minutes

**Proactive
Publication:** Yes

**Internal
Publication:** Yes

Communications options:

Key messages / SLT extra / Blog / external communications

Presenter: Peter Bloomfield

Topic: Steering Group update

Issue: The minutes (including draft minutes) for the following recent steering groups are presented for information:

- Change Board - 21 August, 18 September and 16 October
- DCEO SG - 17 August, 21 September and 19 October
- Policy SG – 7 September and 5 October
- Operations SG – 1 September and 6 October
- Comms SG – 23 August

The minutes will be published as an SLT paper.

Change Programme Board Minutes

21 August 2017

Members

Paul Arnold	Deputy Chief Executive Officer (Chair)
Steve Wood	Deputy Commissioner (Policy)
James Dipple-Johnstone	Deputy Commissioner (Operations)
Jo Pedder	Head of Policy & Engagement
Ken Macdonald	Head of ICO Regions
Faye Spencer	Interim Head of Customer Contact
Heather Dove	Head of Finance
Rob Parker	Head of Corporate Communications
Andrew Laing	Head of Data Protection Complaints and Reviews
Steve Eckersley	Head of Enforcement
Sarah Meyers	Change Programme Manager
Richard Marbrow	Corporate Governance Group Manager

Secretariat

Caroline Robinson	Corporate Governance Officer
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1. Introductions and apologies

Apologies were received from Emma Deen, Jonathan Bamford, Anulka Clarke, Mike Collins and Rachael Cragg

2. Matters arising from the previous meeting

Minutes

The minutes of the previous meeting were agreed

Outstanding Actions

The communications plan was completed.

3. Monthly Report Review

Service delivery

Sarah Meyers updated on the report:-

- PDB refinement of workshop material to training
- PDB implementation project set up with project implementation team meeting separately from SDPB, updated

Change Board 21 August

revised RAID and backlog created with actions prioritised for implementation.

- Working on milestones for critical decisions for pilot implementation

Enabler/Support:

- [Redacted]

Policy & Engagement:

- In addition to the report, Jo Pedder confirmed that there is now a second version of the bill and there will be 3 read through sessions booked in for this week.

4. PDARFs – Proposal for Policy Advice Services

Discussion

The proposed changes to the existing internal policy advice service was discussed with the objective being to focus the limited policy resource more effectively on the ICO's current strategic and operational priorities.

The proposal has two stages:-

- Immediate transitional phase
- Launch of a new rebranded service from May 2018

Decision

It was agreed that we need to look at reducing the demand for requests for advice. However, it is essential to have mechanisms in place to ensure that advice will be available.

Andy Laing stated that there is an increased risk relying on the experience of managers and case officers as this experience has decreased recently which is potentially why more advice is being sought from policy advice.

Actions

Department Heads to meet to agree key messages that need to be communicated across the organisation.

Post Meeting Update:

Actions

Richard Marbrow to add to the risk register the associated risk to the quality of decision making as a result of the change to the PDARF process

5. Communications

Discussion

Robert Parker ran through the new integrated corporate communications grid.

Decision

It was agreed that the communications grid should be taken to the next policy steering group meeting and Rob Parker will be in contact across the office for further requirements

Actions

Caroline Robinson to circulate the communications grid to the board members and to add to the agenda of the next policy and operations steering group.

Robert Parker to meet with department heads to go through the grid. Communications to be agreed and shared with staff in relevant departments by next Change Board Meeting (18/9/17)

6. Any Other Business

[Redacted]

Discussion

Sarah Meyers updated on the following areas:

- Updated milestones on project plan
- EUDPR network meetings held – staff were asked for themes and areas to work on for communications planning – will be discussing with Rob.
- Internal survey launched – featured on ICON
- Change programme project pages on front page of ICON and now all projects have a page with relevant project documents easily accessible

7. Raid Log

Sarah Meyers highlighted that there is a risk around further specific training with gaps in knowledge. This will impact on the ICO's preparedness prior to May 2018 as current staff who have completed DPA to GDPR training will not be receiving any further training as the focus now was on developing new starter training. Jo Pedder confirmed that when guidance is launched Know abouts will be scheduled with it but this was the only other planned training for current staff.

Change Board 21 August

Decision

It was agreed that a review of training will be discussed at the next meeting.

Change Programme Board Minutes

18 September 2017

Members

Paul Arnold	Deputy Chief Executive Officer (Chair)
Jonathan Bamford	Head of Parliament and Government Affairs
Jo Pedder	Head of Policy & Engagement
Mike Collins	Head of Organisational Development
Emma Deen	Head of Business Development & IT
Faye Spencer	Head of Customer Contact
Rob Parker	Head of Corporate Communications
Andrew Laing	Head of Data Protection Complaints and Reviews
Anulka Clarke	Head of Assurance (Interim)
Louise Byers	Head of Risk & Governance
Rachael Cragg	Group Manager Change Programme
Sarah Meyers	Change Programme Manager
Richard Marbrow	Corporate Governance Group Manager

Secretariat

Caroline Robinson	Corporate Governance Officer
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1. Introductions and apologies

Apologies were received from James Dipple-Johnstone, Steve Wood, Steve Eckersley, Heather Dove, Ken Macdonald and Adam Sowerbutts

2. Matters arising from the previous meeting

Minutes

The minutes of the previous meeting were agreed.

Action Board

All actions were completed.

3. Monthly Report Review

Service Delivery:

- Rachael Cragg highlighted that the PDP pilot is due to go live shortly once the new technology and people resources are in place. This is expected to be in early November.

Enabler / Support

- Michael Collins updated the board on the assessment centres that are currently being held. This is a new initiative with the first assessment centre having being held in early September. Feedback from this was very positive. A much greater number

Change Board 18 September

of candidates had been seen than via more traditional selection processes and the assessment centre tests/exercises were felt to have provided a much more robust means of assessment than an 'interview only' approach.

- The board agreed that when doing volume recruitment it is preferable to use the assessment centre model. However, the board must not lose sight of the fact that there is still a lead in time for the recruitment process. The end to end process to fill a position is still three months. Staff in HR and the business managers who had supported the first assessment centre were thanked for their commitment to and support for the new approach.
- [Redacted]
- It was also agreed to highlight the need to pay fees in the SME guidance on GOV.UK.

Actions

Louise Byers to liaise with Corporate Communications about communicating the need to pay fees at the end of the DCMS consultation.

Policy & Engagement

- Jo Pedder updated the board on work the ICO is involved in within Article 29.
- Jonathan Bamford updated on the new Data Protection Bill and guidance.
 - A blog has been posted on ICON.
 - A ministerial meeting was held last week.
 - The second reading of the Bill is scheduled for 10 October.
- Sarah Meyers asked if there is any process in place to deal with any queries about the DP bill. The board agreed to keep an eye on the number of calls coming in and the possibility of putting in a process to capture the nature of these queries if necessary.

4. GDPR Internal Compliance Project

Discussion

- The report makes the board aware of the areas that are being focussed on. The high priority areas identified are:
 - Contracts and
 - Human Resources records

Change Board 18 September

- Work had begun to ensure that ICO's contracts with its data processors are GDPR ready, but progress had been slow particularly since the recent change in focus of legal resources. Louise flagged the need for us to be able to resource this work effectively if we were to ensure contracts are addressed prior to May 2018.

Paul Arnold confirmed that Emma Bate, the ICO's new General Legal Counsel, was available to get directly involved in this work and was also the right person to contact in respect of identifying further legal resources.

- Regarding our HR records, it was confirmed that the task of reviewing all records held by the ICO was significant and resources were limited.

Paul Arnold confirmed that it was important that this work was resourced adequately and that the board should be appraised as soon as possible of any potential shortfall in resources. He also welcomed proposals to bridge the gap with funds to be made available if needed.

- ISO27001: Louise Byers stated that this project is being very well managed however there is a need for other areas of the organisation to be involved.

Actions

Louise Byers to liaise with Emma Bate regarding the resourcing of our contracts work and to bring a resource proposal to the board if necessary.

Mike Collins to liaise with Louise Byers about the resources needed to complete the review of our HR records and to also bring any resource proposal to the Change Board.

5. Open Case Reduction Plan

Discussion

This paper has been brought to the Change Programme Board to be ratified. However, it needed to be first considered by the Service Delivery Project Board (SDPB).

The board also noted that the report appears to take into consideration the needs of one department, but did not appear to consider resources available in more discretionary work areas. The Board also noted that the paper suggested the proposal had already

Change Board 18 September

been implemented from early September before being brought to the Change Board for approval.

Decision

The proposal was not agreed by the board and Rachael Cragg was asked to take it back to the SDPB to ensure consultation with the full range of departments directly affected by the proposal. If, after taking into account matters beyond the boundaries of the Enforcement Department, the proposal was supported by the SDPB, it could return to Change Board or to SLT for final consideration.

Actions

Rachael Cragg to take the report to the SDPB meeting on Thursday to discuss the matter further.

6. How the PDB pilot will work

Discussion

This paper is brought to the board for information.

The Service Delivery Project is overseeing this work.

7. Discussion on operational capacity and demands including consideration of training needs

Discussion

The GDPR staff survey concluded on 8 September. 55% of staff completed the survey. The Change Programme team will study the results and will be highlighting areas of concern. They will also be taking into account the feedback received from Network.

Andy Laing stated that there was an action from the Operation Steering Group for the Operational Department Heads to complete a training needs analysis and take proposals to the Change Programme Board.

Mike Collins indicated to the board that Learning & Development are reviewing the induction process. The possibility of outsourcing meeting training needs was also discussed. Jo Pedder stated that this has been looked at previously.

Decision

The board agreed that the action taken in relation to training needs in the Operations Steering Group is broader than just the Operational Directorate and should also cover other directorates within the organisation.

Change Board 18 September

Actions

Jo Pedder to find the previous papers covering outsourcing training on GDPR and bring them to the next Change Programme Board.

Andy Laing to send Rachael Cragg the training analysis spreadsheet for amendment and to send it out to all departments for completion.

Change Programme team to produce a report on the survey results and bring it to the next Change Programme Board meeting.

8. Communications

Discussion

Robert Parker has been meeting with the Department Heads and reported that everything is on track.

9. Raid Log

Discussion

Paul Arnold asked board members if they were comfortable with the relative risks and issues documented in the RAID log and whether any ratings needed to be amended or actions reviewed. The board agreed the RAID log accurately reflected the risks, actions, issues and decisions across the programme and that no adjustments were needed.

The board discussed the risk that the extra hours currently being worked by staff becomes the "norm". Paul Arnold confirmed that staff working significant additional hours would not be sustainable if it did become the norm and that Department Heads needed to consider whether current arrangements were as a function of peaks in work associated with GDPR preparations or indicative of long term demand. If departments had reviewed their working practices and were satisfied that additional resources were needed for the future then proposals could be submitted. In the meantime staff working additional hours to address business needs should be recognised for their efforts and should definitely be paid overtime for the hours they are working.

10. Any Other Business

There was no any other business.

Change Board 18 September

Change Programme Board Minutes

16 October 2017

Members

Paul Arnold	Deputy Chief Executive Officer (Chair)
Steve wood	Deputy Commissioner (Policy)
James Dipple-Johnstone	Deputy Commissioner (Operations)
Jonathan Bamford	Head of Parliament and Government Affairs
Jo Pedder	Head of Policy & Engagement
Ken Macdonald	Head of ICO Regions
Mike Collins	Head of Organisational Development
Heather Dove	Head of Finance
Rob Parker	Head of Corporate Communications
Andrew Laing	Head of Data Protection Complaints and Reviews
Steve Eckersley	Head of Enforcement
Anulka Clarke	Head of Assurance
Rachael Cragg	Group Manager Change Programme
Sarah Meyers	Change Programme Manager

Secretariat

Caroline Robinson	Corporate Governance Officer
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1. Introductions and apologies

Apologies were received from Richard Marbrow, Faye Spencer, Emma Deen and Louise Byers.

2. Matters arising from the previous meeting

Minutes

The minutes from the previous meeting were agreed.

Action Board

The actions were updated and cleared where possible.

3. Monthly Report Review

Service Delivery

- Rachael Cragg confirmed that the PDB pilot is on track to go live as planned at the start of November.

Change Board 16 October

- The internal DPIA process was discussed and the impact this will have on resource requirements from the Policy Directorate.

Policy & Engagement

- There were no major issues arising from the report.
- Steve Wood updated on the contact from DCMS regarding guidance and particularly the support being given to SMEs to prepare for GDPR.

It was agreed that we need to put in place plans to advertise the work that is currently being done and make use of the helpline to highlight the help that is already in place.

Jo Pedder confirmed that the guidance for SMEs will be loaded onto the gov.net website shortly.

The possibility of conducting our own survey with regard to preparedness for GDPR is already being looked into by Jonathan Bamford, Jo Pedder and Rob Parker.

Action

Jo Pedder to put the DCMS guidance plan onto ICON.

Enabler Project

- [Redacted]
- The new Contact Centre will be going live on Thursday 19 October.
- The Applicant Tracking System will go live on 15 November 2017.
- Mike Collins highlighted the staff turnover increase in the second quarter of the year. Updates on staff turnover will be reported back to the DCEO SG.
- Accommodation; work on the new accommodation should start shortly and the aim is to have Kings Court ready for use in Quarter 4.
- Jonathan Bamford queried the delay that is being experienced with regard to the clearance process and reference checks for new starters. Mike Collins was not aware of any particular problem in the process but will look into it.

Change Board 16 October

- GDPR preparation; Mike Collins confirmed that the work on the ICO leaver files has now started.

Action

Mike Collins to check on the clearance process and report back to DCEO SG.

4. BBFC Paper

[Redacted]

5. Transitional Provisions

Discussion

The Service Delivery team had been asked what transitional provisions were needed for the implementation of GDPR. The paper has been circulated to allow for comments.

Actions

Rachael Cragg to link up with Judith Jones and report back if there are any issues.

6. Review of Staff Survey Results

Discussion

The analysis of the staff survey was discussed.

Agreed

It was agreed that the work of the Network reps should be re-emphasised along with the need to give regular updates to departments.

Action

Each department to engage with the GDPR Network reps.

Communications

Discussion

Rob Parker updated on the communications grid which is working well.

6. Raid Log

Discussion

James Dipple-Johnstone updated on the risk relating to transitional arrangements.

Paul Arnold asked if there is a need for discussions to take place to identify work streams that can be postponed until after May 2018 to enable us to direct all our available resources to areas of greatest GDPR readiness priority.

Change Board 16 October

James Dipple-Johnstone confirmed that some discussions have been taking place within Assurance.

7. Any other business

Discussion

There was no other business

Deputy Chief Executive Officer Steering Group minutes 17 August 2017

Members

Paul Arnold	Deputy Chief Executive Officer (Chair)
Ken Macdonald	Head of ICO Regions
Emma Deen	Head of Business Development and IT
Heather Dove	Head of Finance
Andrew Laing	Head of Data Protection Complaints and Reviews
Steve Eckersley	Head of Enforcement
David Wells	Head of IT Assurance
Richard Marbrow	Corporate Governance Group Manager

Secretariat

Caroline Robinson	Corporate Governance Officer
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1. Introductions and apologies

Apologies were received from Faye Spencer, Louise Byers, Robert Parker, Mike Collins and Jonathan Bamford.

2. Matters arising from the previous meeting

Minutes

The minutes of the previous meeting were agreed with the amendment to Dave Wells' job title as Head of IT Assurance.

Action Board

Updates were given on the action board

3. Finance Report

Discussion

Heather Dove ran through the highlights from the Finance Report.

- Income remains on track and costs remain within our accepted variance level.
- The biggest expenditure will be staff recruitment. There is also some uncertainty in this area due to changing business needs leading to different resource strategies with differing

DCEO Steering Group 17 August

cost profiles being introduced in year. This is however being tracked closely.

- Budget planning for 2018/19 will begin in September with a view to sign off with DCEO Steering Group and Senior Leadership Team in November.
- Heather is meeting with DCMS in September to discuss how to treat the loan this year and the budget for next year. It was agreed that the details of this meeting do not need to be brought to the Steering Group for a decision.

Richard Marbrow queried the permanent planned FTE figure for band H.

Actions

Heather Dove to double check the figure for band H

Heather Dove asked whether the FOI Budget should come to the DCEO SG on a quarterly basis.

Decision

The group agreed that the FOI budget can be brought annually unless there is a specific risk to flag within the year.

4. IT Strategy

Discussion

Emma Deen ran through the new dashboard report. The group agreed that the new dashboard format works very well.

- Emma Deen explained that P1 refers to a total loss of systems and P2 refers to partial loss of systems.
- By keeping the number of problems awaiting project/change under the SLA of 10 we are achieving the right balance between maintaining a stable environment, and introducing changes and new innovation. Changes to the live environment can inevitably lead to incidents where a problem record is generated.
- The monitoring section refers to cyber security. The project hopes to take the monitoring to a higher level than we currently have.

Steve Eckersley suggested that the Dashboard should be shared across the office. Emma agreed that the plan is to make it available on the Business Development and IT page on ICON.

Actions

Emma Deen to make the dashboards available on ICON

DCEO Steering Group 17 August

Discussion

Email trust and leaving PSN

- Progress is being made on the management of Official and Official Sensitive emails.
- Reasonable feedback has been received from Heads of Departments on who Official Sensitive emails are being sent to.
- The next steps will be to encourage staff to consider what they are sending and how it should be sent.

Action

Dave Wells (via Steve Rook) to take an urgent item to the next LIMO forum to ask what official sensitive information is sent by email, in what context (eg, casework, contract management etc) and approximately how many emails per day/week/month this represents.

Steve Eckersley confirmed that he is putting together a position paper with regard to cyber security and staff security clearance. Dave Wells confirmed that Steven Rook is working with Mike Collins on the clearance process and a paper should be going to the Senior Leadership Team shortly.

5. Terms of reference

The amended Terms of Reference were agreed.

6. Any other business

Paul Arnold updated the group on the Senior Leadership Team meeting on Monday.

- There was a proposal to bring OD function into line with the rest of the organisation and recruit Group Managers into that function. The proposal was approved by the Senior Leadership Team.

Accommodation:-

- A lease has been secured on new accommodation within Kings Court. A project team will be meeting within the next two weeks to look at the next steps and how to best utilise the space. The group thanks Mike Collins and his team for their excellent work in securing the new accommodation in such quick time and helping to mitigate a significant corporate risk.

7. Risk Register

Decision

It was agreed to reduce the accommodation risk to 1

Deputy Chief Executive Officer Steering Group minutes 21 September 2017

Members

Paul Arnold	Deputy Chief Executive Officer (Chair)
Jonathan Bamford	Head of Parliament and Government Affairs
Mike Collins	Head of Organisational Development
Emma Deen	Head of Business Development & IT
Faye Spencer	Head of Customer Contact
Heather Dove	Head of Finance
Rob Parker	Head of Corporate Communications
Andrew Laing	Head of Data Protection Complaints and Reviews
Louise Byers	Head of Risk and Governance
David Wells	Head of IT Assurance

Secretariat

Caroline Robinson	Corporate Governance Officer
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1. Introductions and apologies

Apologies were received from Richard Marbrow, Ken Macdonald and Steve Eckersley

2. Matters arising from the previous meeting

Action Board

Updates were given on the action board and all actions were cleared.

3. Finance Report

Discussion

Heather Dove ran through the highlights from the Finance report.

- We are now half way through the financial year with no material variances to cause concern
- Budget planning for 2018/19 has now commenced with a view to sign off with DCEO SG and SLT in November.
- Heather Dove flagged the savings currently showing on the salary costs in this month's report. These savings have been

DCEO Steering Group 21 September

budgeted elsewhere within the organisation to cover new initiatives.

The group discussed the workforce planning and wanted to check whether it was on track.

Decision

It was agreed to refresh the recruitment plan each quarter.

Actions

Mike Collins to bring a recruitment progress report to the next Steering Group meeting in October.

4. IG Strategy

Recruitment Checks Paper

Discussion

The group discussed the paper presented by Mike Collins regarding security checks for new staff. The three options outlined in the paper were considered.

Decision

The group were comfortable to align the ICO with wider government practices and agreed to implement option 3; to carry out mandatory security checks in line with the Baseline Personnel Security Standard (BPSS) as part of our recruitment check process after joining the ICO. This timing would be considered on a case by case basis according to the role being recruited.

It was further agreed that the same standards should apply to temporary staff.

It was agreed that any fees incurred by a candidate applying for the disclosure certificate will be reimbursed by the ICO.

Actions

Mike Collins to liaise with Heather Dove with regard to reimbursing the fee.

Mike Collins to ensure that a Privacy and Security Impact Assessment is carried out.

Paul Arnold to mention the issue with the Senior Leadership Team.

Email Security

[Redacted]

IT Assurance Quarter 2 Report

Discussion

[Redacted]

5. Any other business

Discussion

The resilience paper circulated by Mike Collins was discussed.

Paul Arnold stated that the work needed to better reflect resilience associated with preparing to recruit new staff as well as knowledge management.

Decision

It was agreed that it would be very useful to present the paper to the Senior Leadership Team.

Actions

Mike Collins to make the recommended amendments to the report and circulate.

Discussion

Paul Arnold informed the group that SLT Formal meetings will now be meeting once a month.

Decision

An ICON communication will be updating all staff in due course.

Deputy Chief Executive Officer Steering Group minutes 19 October 2017

Members

Paul Arnold	Deputy Chief Executive Officer (Chair)
Jonathan Bamford	Head of Parliament and Government Affairs
Ken Macdonald	Head of ICO Regions
Mike Collins	Head of Organisational Development
Emma Deen	Head of Business Development & IT
Faye Spencer	Head of Customer Contact
Heather Dove	Head of Finance
Rob Parker	Head of Corporate Communications
Andrew Laing	Head of Data Protection Complaints and Reviews
Steve Eckersley	Head of Enforcement
Louise Byers	Head of Risk and Governance
David Wells	Head of IT Assurance
Richard Marbrow	Corporate Governance Group Manager

Secretariat

Caroline Robinson	Corporate Governance Officer
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1. Introductions and apologies

There were no apologies

2. Matters arising from the previous meeting

Minutes

The minutes from the previous meeting were agreed

Action Board

Actions were updated and cleared where possible

- Mike Collins updated on the new security clearance process.

3. Finance Report

Discussion

Heather Dove confirmed that income and expenditure were on track. The group noted risk and challenges arising from managing

DCEO Steering Group 19 October

the number of new initiatives over the next 6 months; eg, preparing Kings Court, IT Projects and recruitment.

4. People Strategy

Home Working Policy

Discussion

The group discussed the updated home working policy which allows more flexibility for Departments Heads to manage the needs of their department.

Emma Deen highlighted that there is at least a four week lead time on new homeworking kit while the encryption software replacement project takes place.

Decision

It was agreed that the amended policy should be implemented.

Staffing Report - Outsourcing

Discussion

The recruitment process was discussed; in particular the need to explore all avenues to fill vacancies efficiently, both for internal and external candidates.

The group also discussed the possibility of outsourcing some strategic projects should we not have the resources to cover the work in-house.

Decision

It was agreed to further consider starting a procurement process to outsource certain projects.

Actions

Paul Arnold to seek the views of the Senior Leadership Team on outsourcing work.

Each Department Head to look at how outsourcing could be utilised within their department

Discussion

The equal pay analysis was discussed.

Decision

It was confirmed that work was done routinely to make sure our recruitment and selection practices were fair and equitable with gender being one such area of focus. It was confirmed that providing equality of opportunity and ensuring the best candidate is appointed to each role we advertise was our approach and at this

DCEO Steering Group 19 October

time the Steering Group didn't recommend any further courses of action. The Steering Group was however interested in the views of the SLT and MB who will be presented with the information at the next MB meeting.

5. ISO27001

Discussion

This paper provides an update on the work of the project board and comes to the group for approval of the high level documentation required for certification.

Decision

There were no issues with the paper and it was agreed that the paper should go to Management Board in November.

6. Any other business

- Mike Collins highlighted that the European Data Protection Supervisor had sent through a request for Seconded. It was agreed to decline the request in line with our established policy in this area subject to confirming Steve Wood's views given his responsibility for our International work and relationship with the EDPS.
- Next year's flexi calendars will have two systems; calendar A and calendar B to help manage flexi days across the organisation. This will be implemented in the New Year.
- Paul Arnold stated that there is a need to start planning for 2018/19 and identify new roles that we do not currently have within the business.
- Jonathan Bamford highlighted the ongoing room booking problem and identified a need to reinforce the etiquette of booking rooms and releasing rooms if they are no longer needed.

It was agreed that these points should be reinforced within each department. Emma Deen confirmed that IT can put a tip of the week on ICON on how to cancel a room booking.

7. Risk Register

Discussion

The risk relating to outsourcing projects was discussed.

Decision

It was agreed that pending discussions on this issue, this will need to be added to the risk register possibly as a mitigating action to the recruitment and retention risks.

Policy Steering Group minutes

7 September 2017

Members

Steve Wood	Deputy Commissioner (Policy) (Chair)
Jonathan Bamford	Head of Parliament and Government Affairs
Jo Pedder	Head of Policy and Engagement
Heather Dove	Head of Finance
Robert Parker	Head of Corporate Communications
Richard Marbrow	Corporate Governance Group Manager
Rachael Cragg	Group Manager Change Programme

Attendees

Elizabeth Denham	Information Commissioner
Adam Stevens (joining for Item 3)	Acting Group Manager, Intelligence and Research

Secretariat

Caroline Robinson	Corporate Governance Officer
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1. Introductions and apologies

Steve welcomed Elizabeth to her first Policy Steering Group meeting

Apologies were received from Faye Spencer, Adam Sowerbutts, Anulka Clarke, Ken MacDonald and Peter Brown

Action:

Steve Wood to liaise with James Dipple-Johnstone about arranging substitutes for future meetings where necessary.

2. Matters arising from the previous meeting

Minutes

There were no matters arising from the previous minutes and the minutes were agreed.

Action Board

- Completed actions were cleared.
- It was agreed to put the action regarding developing a road map to help identify regulatory overlap on hold until a secondee was in place and available to consider the issue. The

Policy Steering Group 7 September

action date was to be updated accordingly for clearance by 31 October.

3. Strategic Files

Discussion

Richard Marbrow presented a paper on the proposed strategic file and priority case procedure. Richard explained that the proposal would provide transparency for the Senior Leadership Team and allow cases to be prioritised effectively.

Decision

The proposal was agreed and will be taken to SLT for approval before being rolled out across the ICO organisation by the end of October.

Actions

Adam Stevens to amend existing templates to include investigations plans, decisions made and a de-brief when a case is closed

Richard Marbrow and Adam Stevens to make minor amendments to the process based on the feedback received at the meeting and to bring the paper to the Senior Leadership Team on the 9 October.

4. Review of Priority Policy Work streams

British Board of Film Classification

Discussion

Jo Pedder presented a paper on the Digital Economy Act 2017 and the provisions requiring age verification for access to online porn. The ICO was liaising with the BBFC and to develop guidance in this area.

It was recognised that there is a broader issue involving vulnerable people; when people want help to stop looking at porn.

Decision

It was agreed to recommend that the guidance includes vulnerable people and not just children.

The group noted the risks highlighted in the paper and felt it was important that the issue is referred back to Change Board in the autumn.

It was agreed that this item should remain on the policy work stream tracker.

Policy Steering Group 7 September

Action

Corporate Governance to put the item on the agenda for the next Change Board meeting, 16 October.

CCTV

Discussion

The group discussed the interpretation of the DPA section 36 domestic purposes exemption with regard to CCTV. The group also discussed the use of dashcams and handheld devices for personal use.

Decision

It was agreed that issues around the use of dashcams were different to those of standard CCTV and may need to be looked at separately.

Handheld devices used for personal use were not considered.

The group supported the recommendation in the report of adopting Option B.

Actions

Jo Pedder to organise a Tasking and Coordinating Group to discuss matters arising and to report back to the Steering Group at the next meeting on 5 October.

Data Ethics

Discussion

Proposals for the ICO's possible involvement in taking forward Data Ethics issues were presented for discussion.

Decision

The group supported the paper and its recommendations.

5. Research Update

Discussion

There were no updates.

6. Grants Programme update

Discussion

Lisa O'Brien provided a report outlining the number of applications received for the Grants Programme and the amounts requested.

117 applications have been received from a wide variety of organisations and individuals. The panel will be meeting next week to consider all the applications.

Policy Steering Group 7 September

It was noted that a replacement will be needed for Lisa O'Brien once she transfers over to the Commercial Legal Team. It was confirmed that this vacancy should be covered in the current recruitment process for Senior Policy Officers.

Actions

Lisa O'Brien to explore the possibility of referring strong grant applications that are not accepted to other funding bodies and to report back to the Steering Group by 5 October.

7. Technology Update

Discussion

Peter Brown had provided a written brief update. A full update will be coming to the next Policy Steering Group.

8. Consultation and Select Committee responses

Discussion

Steve Wood stated that the report indicates the breadth of activity currently taking place.

9. Change Programme

Communications Grid

Discussion

The aim of the grid is to present an overview of the change project and activities from a communications perspective as we count down to May 2018.

Robert Parker highlighted that we have been approached by a company keen to be involved in a GDPR awareness campaign. Whilst this was an opportunity, there is a need to ensure that we have the right messages to send to data controllers and a coherent communications plan in place by the time this campaign was run.

Actions

Robert Parker to explore the possibility of being involved in the campaign and to report back to the Steering Group on [?].

SME Guidance

Discussion

Jonathan Bamford presented a paper on advice for SMEs which would encompass their duties under GDPR. This guidance would be made available on .gov.uk.

Decision

It was agreed that using .gov.uk would be helpful in getting our messages across, linked to from our own website.

Policy Steering Group 7 September

Actions

Jonathan Bamford to arrange a meeting with representatives from Parliamentary and Government Affairs, Policy & Engagement and Communications to discuss the material to be included in the guidance.

10. Risk and Opportunity Register

Discussion

There were no new risks to be added to the register

Jo Pedder flagged up that the risk rating on staff retention appeared to be low.

Action

Rachael Cragg to amend the Policy and Engagement RAID log in relation to pressure on the ICO to have comprehensive GDPR guidance available immediately.

11. Any Other Business

There was no other business.

Policy Steering Group 7 September

Policy Steering Group minutes

5 October 2017

Members

Steve Wood	Deputy Commissioner (Policy) (Chair)
Emma Bate	General Legal Counsel
Ken Macdonald	Head of ICO Regions
Faye Spencer	Head of Customer Contact
Heather Dove	Head of Finance
Robert Parker	Head of Corporate Communications
Adam Sowerbutts	Head of Freedom of Information Complaints and Appeals
Anulka Clarke	Head of Assurance
Richard Marbrow	Corporate Governance Group Manager
Rachael Cragg	Group Manager Change Programme

Attendees

Iain Bourne	Senior Policy Officer
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Secretariat

Caroline Robinson	Corporate Governance Officer
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1. Introductions and apologies

Apologies were received from Jonathan Bamford, Peter Brown and Jo Pedder.

Steve Wood welcomed Emma Bate to her first Policy Steering Group (PSG) meeting.

2. Matters arising from the previous meeting

Minutes

The minutes of the previous meeting were agreed.

Iain Bourne updated the group on the Data Ethics paper. The paper has been sent to DCMS and had been well received.

Action

Iain Bourne to provide a further written update on Data Ethics at the next PSG meeting.

Policy Steering Group 5 October

Action Board

The outstanding actions were updated and cleared where necessary.

3. Risks and Opportunities Register

Discussion

The group noted that there was a heightened risk relating to the pressure on the Policy Directorate. This was due to work arising from the passage of the Data Protection bill through Parliament. Rachael Cragg confirmed that this has been reflected in the Policy & Engagement RAID Log

Steve Wood highlighted the close working between the Parliament and Government Affairs Department and the Communications Department in developing the "12 steps to preparing for the Law Enforcement Directive".

Actions

Steve Wood to discuss how best to mitigate this risk with Jonathan Bamford and Jo Pedder.

Corporate Governance to move ownership of the risk relating to a significant legal judgement having an impact on ICO work from Steve Wood to Emma Bate.

4. Priority Cases

Fire Safety Report

Discussion

The project considering public access to fire safety reports was discussed.

Decision

It was agreed to concentrate on access to reports concerning residential buildings initially.

Actions

Corporate Governance to arrange a meeting between Ken Macdonald, Jo Pedder and Adam Sowerbutts to look at which teams are best placed to contribute to the work and agree timescales.

5. Management Board Report

Discussion

There were no specific items to flag up for the Management Board Report.

6. Grants Programme update

Discussion

Steve Wood updated the group on the progress of the grants programme. An internal panel had met to conduct an initial review of applications, followed by an external grants panel on Monday 2 October. There are now four applications being forwarded to the Commissioner with a recommendation to fund the research.

The group discussed the possibility of linking some of the applicants who were looking at similar research ideas.

7. Technology Update

Discussion

Peter Brown prepared an update on the actions recently taken by Technology Policy Department.

Steve Wood announced that a Head of Technology Policy has been appointed and will be in post towards the end of November.

8. Communications

Data Protection Practitioner's Conference 2018

Discussion

The conference has been planned for 9 April 2018. Rob Parker highlighted the need to identify the content leads for the five aims of the Information Rights Strategic Plan.

Decision

The group was supportive of the concept of the five content leads. It was agreed to bring the item to the next Change Programme Board to identify the leads.

A request for potential attendees to register an interest would be sent out in the October enewsletter.

Actions

Corporate Governance to add the item and paper to the agenda of the next Change Programme Board meeting on 16 October so that the Board could identify the five content leads and set up a project board for the conference.

ICO 2017 Research Review

Discussion

Rob Parker ran through the proposals for benchmarking and tracking of personal data.

Decision

It was agreed that this review is a useful tool to have.

9. Change Programme

Discussion

Rachael Cragg updated the group on the activities of the various change programme project boards and on additions made to the RAID log.

Decision

It was agreed that the Policy & Engagement monthly update report should be brought to the PSG meeting prior to the Change Programme Board meeting.

Steve Wood updated the group on the A29 meeting that he had attended earlier this week and the ICO papers that were adopted into guidance.

Steve Wood highlighted the risk on cross board complaints / infringements. It was felt that next steps and plans need to be agreed.

Actions

Rachael Cragg to meet with Hannah McCausland and Chris Hogan to discuss European coordination and contact points.

10. Consultation and Select Committee responses

Discussion

The group discussed the current list of consultations/calls for evidence.

Rob Parker highlighted a need for a consistent and professional approach to the finished responses. There is a standard template that is currently being used but it was agreed that this may need to be reviewed.

Actions

Rob Parker to speak with Jonathan Bamford and Judith Jones about the style of the template.

Ken Macdonald updated the group on his meeting with the Scottish Parliament yesterday.

11. Any other business

Court Judgements

It was agreed that there should be a standard agenda item to cover court judgements now that Emma Bate has joined the PSG.

Steve Wood provided an update on a recent court case around the issue of international transfers of data.

Policy Steering Group 5 October

Action

Emma Bate to prepare a paper for the next PSG meeting on the short, medium and long term implications of the Schrems judgement.

GDPR Awareness Campaign

Rob Parker updated the group on the proposal brought to the last meeting about a consortium wanting to run an awareness campaign on GDPR. A paper will be taken to SLT.

Action

Rob Parker to provide an update at the next PSG meeting.

Policy Steering Group 5 October

Operations Steering Group minutes

Friday 1 September 2017

Members

James Dipple-Johnstone	Deputy Commissioner (Operations)
Jo Pedder	Head of Policy and Engagement
Emma Deen	Head of Business Development & IT
Andrew Laing	Head of Data Protection Complaints and Reviews
Adam Sowerbutts	Head of Freedom of Information Complaints and Appeals
Steve Eckersley	Head of Enforcement
Hannah Smith	Lead Communications Officer (Digital)
Richard Marbrow	Corporate Governance Group Manager

Secretariat

Peter Bloomfield	Senior Corporate Governance Manager
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1. Introductions and apologies

There were apologies from Faye Spencer, Anulka Clarke and Robert Parker. Hannah Smith was welcomed in Robert Parker's place.

2. Matters arising from the previous meeting

Minutes

The minutes were agreed for accuracy and publication.

Outstanding action points were discussed and cleared where possible.

It was noted that there had been discussion of the need for operational performance reports to come monthly to the Steering Group, and to accommodate this the dates of the Steering Group would need amending to the Friday of the first full week of the month.

Operations Steering Group 1 September

Outstanding internal audit recommendations were also considered. Steve Eckersley noted that the action in respect of timescales for investigations (due to be completed by 30 September) was already completed.

Actions and decisions

Corporate Governance to change the Steering Group dates as discussed in time for the next meeting.

Steve Eckersley to confirm to Peter Bloomfield that the outstanding internal audit recommendation had been cleared, by close Monday 4 September.

3. Operations summary report

Discussion

Sift backlogs were discussed. It was noted that the backlog had been cleared this month and there were some duplicate cases.

No other issues were identified.

4. Verbal updates

Enforcement

- The department was keeping pace on intake despite growth in cases received.
- Similarly work was up to date on civil monetary penalties.
- The department was considering the criteria for closing cases. The criteria were to be circulated to the Steering Group.
- There was an update on the draft Regulatory Action Policy (RAP). There was a need for final comments before the draft was passed to James Dipple-Johnstone for discussion with the Commissioner, and then to the Steering Group. Any possible impact from the Data Protection Bill also had to be considered.

Steve Eckersley to circulate the case closure criteria to the Steering Group by close Friday 8 September.

Steve Eckersley to pass the draft RAP to James Dipple-Johnstone prior to discussion with the Commissioner by close Friday 8 September.

Data Protection Complaints and Reviews

- 1,700 cases had been received and 1,650 cleared. Cases were being allocated from May.
- The department was expecting to be at full complement by the end of September.

Operations Steering Group 1 September

- Andrew Laing advised that meeting rooms SM03 and SM04 were now being used to accommodate staff.
- GDPR training was raised as a potential issue, in particular the line between formal GDPR training, development of policy lines and advising staff of the policy lines as normal business.

Operational Department Heads to complete training needs analysis for their departments by the next Operations Delivery Board and to put proposals to the Change Programme Board.

FOI Complaints and Appeals

- The department had closed more cases than received.
- The age of unallocated cases was about three months.
- The department was close to meeting its KPIs.
- It was planned to take level Cs from the assessment centre which if successful would mean the department would be close to full complement by the end of September.

5. High profile case tracker

Discussion

Richard Marbrow highlighted the changes in the process for managing high profile cases. A draft procedure was with Deputy Commissioners for comments. The aim was to have one set of priority cases. Regular reports to SLT would allow them to flag up concerns.

6. Communications grid

Discussion

Hannah Smith presented the GDPR communications grid. It drew together all of the projects which Communications need to contribute to.

Decision

It was agreed that the grid should be reviewed quarterly.

8. Risk and opportunities.

The risk and opportunity register were considered.

9. Any other business

James Dipple-Johnstone was shortly to send out a note about escalation of issues to the Commissioner, and would be seeking nominations for research on Cyber.

Operations Steering Group 1 September

Operations Steering Group minutes

6 October 2017

Members

James Dipple-Johnstone	Deputy Commissioner (Operations)
Jo Pedder	Head of Policy and Engagement
Faye Spencer	Head of Customer Contact
Andrew Laing	Head of Data Protection Complaints and Reviews
Adam Sowerbutts	Head of Freedom of Information Complaints and Appeals
Steve Eckersley	Head of Enforcement
Anulka Clarke	Head of Assurance
Robert Parker	Head of Corporate Communications
Richard Marbrow	Corporate Governance Group Manager

Secretariat

Caroline Robinson	Corporate Governance Officer
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1. Introductions and apologies

Apologies were received from Emma Deen

2. Matters arising from the previous meeting

Minutes

The minutes from the previous meeting were agreed.

Actions and decisions

Outstanding actions points were discussed and cleared where possible.

3. Operations Summary Report

Discussion

The new monthly summary report was reviewed. It was noted that there appeared to be a few discrepancies in the figures.

Operations Steering Group 6 October

Actions:

Operation Department Heads to verify the figures to ensure that the stats on the monthly report tally with expectations. Comments on the report to be fed back to James Dipple-Johnstone by 13 October.

4. Business Plan Updates

FOI Complaints and Appeals

- Currently running at a deficit on the year. However, it is anticipated to pull back 15% of cases in second half of the year.
- Recently lost two senior case officers and looking at replacing with a combination of Ds and Cs which will allow for more members of staff within the department.
- There is a risk of losing staff in the policy recruitment process.

Action

Adam Sowerbutts to look at mitigating the risk of losing staff by putting in plans to backfill any vacancies.

Data Protection Complaints and Appeals

- Volume: The second half of year is expected to be more productive than the first half.
- Timeliness: Still awaiting for the figures
- Quality: Service reviews and complaints; the group discussed the possibility of conducting a customer satisfaction survey in second half of the year. Andy Laing confirmed that the target is to have cases closed within a three month period.
- Resources: Target for the department is 100 staff and it is currently running at 85. There are still vacancies to fill which is proving difficult. Andy Laing proposed a movement of staff which included increasing the number of level Ds within the department. This was agreed in principle by the group.

Enforcement

- Draft three of the Regulatory Action Policy from will soon be ready to circulate to the group and SLT.
- The risk level of the KPI cases has been changed. It was agreed to clear high risk cases quickly. This does not include the priority cases within the organisation.
- Resources: Steve Eckersley ran through the vacancies currently within Enforcement.
- The feedback received from the recent assessment centre recruitment was very positive.
- NIS: A paper is being drafted.
- Ongoing cases: The priority cases can be a drain on resources. Richard Marbrow confirmed that a draft of the

Operations Steering Group 6 October

priority case procedure will be available soon and will be looking at the resource allocation plan.

Assurance

- Running to plan with regard to DPA audits and follow ups
- There are currently seven vacancies within the department at the moment.
- All audits that we have committed to undertake by the end of year will be fulfilled.
- All but two visits focussing on breach reporting in central government have now been completed. Once completed, an outcomes report will be produced.
- Starting work on the charity sector on the back of recent enforcement work
- SME workshops are planned in quarter three and will be focussing on Health.
- New GDPR toolkit is on track.
- PECR audits: On track for the ten planned for the year.
- Final DRIPA report will be ready go to Elizabeth Denham in October.
- BCRs: Currently have 40 live applications. A blog is being planned around BCRs.
- Recruitment; looking to recruit 11 lead auditors plus a Level E Legal Executive to help the BCR team.
- EIDAS has been added to the change programme backlog.

5. Regulatory Action Policy

Discussion

The Regulatory Action Policy was discussed. Version 4 will be ready to circulate to Group members by 11 October. Any comments on the policy to be fed back to Steve Eckersley.

Actions

Steve Eckersley to send out version 4 of the Regulatory Action Policy by 11 October.

6. Risk Register

The risk and opportunity register was considered.

8. Any other business

Management Board Report:

- The new format for the management board report was discussed.

Data Protection Complaints and Appeals LNA

- This was brought to the group for information and will be going to Change Programme Board.

Operations Steering Group 6 October

Richard Marbrow confirmed that the PDARF pipeline has slowed down and thanked the group.



Communications Steering Group minutes

Wednesday 23 August 2017

Members

Robert Parker	Head of Corporate Communications (chair)
Ken Macdonald	Head of ICO Regions
Steve Eckersley	Head of Enforcement
Anulka Clarke	Head of Assurance
Richard Marbrow	Corporate Governance Group Manager

Secretariat

Mehreen Perwaiz	Corporate Affairs
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1. Introductions and apologies

There were apologies from Jonathan Bamford, Adam Sowerbutts, Jo Pedder and Peter Bloomfield.

2. Benchmarking the Information Rights Strategic Plan

Discussion

Benchmarking will be part of the planning event on the 12 September.

Procurement of the annual track research is underway.

More qualitative research has been requested on trust issues. This will be a desk based research project. The results will then input into decisions on the Citizens' Reference Panel.

4. Corporate communications grid for GDPR

Discussion

Robert Parker introduced the grid. It was not included in the Change Board papers but would be circulated shortly. It helps clarify and break down the audiences the ICO needs to reach, and hence identify any gaps in ICO communications work.

5. Data Protection Practitioners' Conference

Discussion

The conference will be held on the 8/9 April 2018. In respect of support from staff this would have to be managed carefully due to the then imminent commencement of the GDPR.

There was discussion about who the headline speaker might be, and what might be promoted at the conference.

6. Speech writing

Discussion

It was confirmed that press office would meet with the Commissioner and relevant experts in the ICO two months before a speech was due to ensure timely preparation.

7. Staff survey

Discussion

The staff survey would be run in October. It would include staff focus groups.

There would be communications to staff on the survey and on what had happened after the last survey – on taking forward actions.

8. International Conference of Information Commissioners

Discussion

It was confirmed that staff could attend this conference so long as there was a clearly identified development opportunity from doing so, and it was agreed by their line manager.

9. Any other business

Robert Parker confirmed that the Group Manager vacancy in Corporate Affairs had been filled. Another Group manager would be appointed to increase resilience.